

**From:** [grish.org](mailto:grish.org)  
**To:** [Howard Ducat/DC/USEPA/US@EPA](mailto:Howard.Ducat/DC/USEPA/US@EPA)  
**Cc:** [Charles Faultry/R6/USEPA/US@EPA](mailto:Charles.Faultry/R6/USEPA/US@EPA); [Charles Sands/DC/USEPA/US@EPA](mailto:Charles.Sands/DC/USEPA/US@EPA); [Donald Williams/R6/USEPA/US@EPA](mailto:Donald.Williams/R6/USEPA/US@EPA); [Abby \[USA\] Lee](mailto:Abby.[USA]Lee); [Nelson Fox/DC/USEPA/US@EPA](mailto:Nelson.Fox/DC/USEPA/US@EPA); [Patricia Gowland/DC/USEPA/US@EPA](mailto:Patricia.Gowland/DC/USEPA/US@EPA); [Rishi Das/DC/USEPA/US@EPA](mailto:Rishi.Das/DC/USEPA/US@EPA); [Shawn Ghose/R6/USEPA/US@EPA](mailto:Shawn.Ghose/R6/USEPA/US@EPA); [woodson.joel@bah.com](mailto:woodson.joel@bah.com); [Connie Andrews/DC/USEPA/US@EPA](mailto:Connie.Andrews/DC/USEPA/US@EPA); [richardson.robin@epa.gov](mailto:richardson.robin@epa.gov); [James Woolford/DC/USEPA/US@EPA](mailto:James.Woolford/DC/USEPA/US@EPA); [Cheryl Upton/DC/USEPA/US@EPA](mailto:Cheryl.Upton/DC/USEPA/US@EPA); [Barnes Johnson/DC/USEPA/US@EPA](mailto:Barnes.Johnson/DC/USEPA/US@EPA)  
**Subject:** Re: Information Request Line Response  
**Date:** 09/23/2010 03:18 PM

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Mr. Ducat,

I confirm that I have received from you what appears to be a scan of the complete original Record of Decision for Arkwood Superfund Site (EPA ID ARD084930148) in a file named OriginalROD.pdf; I also received the file named onlineroD.pdf.

The latter is, as you indicated, the same as that which appears currently on the EPA website you maintain; therefore it was unnecessary to send it and not responsive to my original request for the complete document, which original request I made due to the online version's being incomplete.

The online version is missing more than just figures and graphics, contrary your reasoning below.

By comparing the two files, I see that the online version (after the title page) picks up with text from the middle of the page numbered "19." in the original version, with the second paragraph that is headed in the complete version as "Cancer causing Compounds:" under section V. Summary of Site Characteristics part A. Types of Contamination. Those important headings, section and part numbers are omitted in the online version.

Apart from figures and graphics, there are more than sixteen (16) pages of pure text missing from the original ROD as that document is currently published on the EPA website, including the Declaration pages, Site Name, Location and Description, Site History and Enforcement Activities, Highlights of Community Participation, and Scope and Role of Response Action Within Site Strategy.

As I have stated: these matters are of significant public interest and are not at all trivial.

I understand the reasoning behind removing images such as figures and graphics for file-size considerations. However, the full text of the ROD should be on the website, and I see nothing preventing that lacuna from being immediately corrected.

I would still be interested to know which of the ten Regional Contacts to whom your office referred me I should have contacted to avoid this difficult exchange you claim I "instituted."

You state below: "I took the time after your email yesterday, and followed the original suggestions my contractors sent you, which was contacting the Region 6 contacts that we sent you."

Specifically which of the ten people did you call from that list of contacts your contractor sent me in response to my request for the complete ROD for Arkwood, which request I submitted on the EPA website?

I ask not only to make a point but also to know whom to thank for so quickly supplying the requested documentation, which was apparently ready at hand.

Regarding your statement made below: "I'll be sure to keep your e-mail address on file, and make sure you are aware of when the application launches."

I hope you will keep your promise to do this. I will be expecting to receive that notification when the launch does take place.

Sincerely,

Curt Grisham

On Sep 23, 2010, at 9:53 AM, Ducat.Howard@epamail.epa.gov wrote:

> I'll be sure to keep your e-mail address on file, and make sure you are  
> aware of when the application launches.  
>  
> Up until December 2008, I worked for 28 years in the private sector as  
> well. I'm not sure what your point is, but its irrelevant to your  
> request.  
>  
> As for buck passing, if you had taken our earlier suggestions and  
> contacted the Regional Contacts for this document as I had, the entire  
> exchange you've instituted would not have been necessary.  
>  
> If you can confirm you've received the information you originally  
> requested, I can go on to working on other things.  
>  
> Thank you.  
>  
> Howard C. Ducat  
> OSRTI Webmaster  
> SEMS Communication Services Manager  
> SEMS Reference Desk TO 75 TOPO  
> Superfund Internet/Intranet TO 73 TOPO  
> EPA/OSWER/OSRTI/IMB  
>  
> 703 603-8797 - Office  
>  
> 703-628-8919 TTY/Cell  
>  
> Please consider the environment before printing this e-mail.  
>  
>

>  
> From: Grish <curt@grish.org>  
> To: Howard Ducat/DC/USEPA/US@EPA  
> Cc: Charles Faultry/R6/USEPA/US@EPA, Charles Sands/DC/USEPA/US@EPA, Donald Williams/R6/USEPA/US@EPA, "Abby [USA] Lee" <lee\_abby@bah.com>, Nelson Fox/DC/USEPA/US@EPA, Patricia Gowland/DC/USEPA/US@EPA, Rishi Das/DC/USEPA/US@EPA, Shawn Ghose/R6/USEPA/US@EPA, "woodson\_joel@bah.com" <woodson\_joel@bah.com>  
> Date: 09/23/2010 12:26 PM  
> Subject: Re: Information Request Line Response  
>  
>  
>  
>  
>  
> Thanks. Too bad you or your contractor didn't just send the complete ROD in your original response, since that's all I wanted or asked for. You just proved that would have been possible.  
>  
> As I said, this has been an exercise in wasteful bureaucratic buck-passing, with a soupçon of consulting for added noise.  
>  
> Yes, I'll be anxiously awaiting the new application's launch sometime \*after\* January 1, 2012. Gotta' love those "definitely-no-sooner-than-possibly-much-later" type project deadlines.  
>  
> You see, I have worked with IS technologists and outside consultants in the private sector. This is a phenomenon quite familiar to me.  
>  
> Except in the private sector, when a file server isn't working up to speed, we just change it out. We don't refer the issue to Booz Allen, and we don't let it stay and just add more like it.  
>  
> Glad I could help validate the need for something you have been working on for "some time," have a contractor selected for, and are already in the final stages of testing. I'm surprised you didn't have a contractor quantify and analyze the need and demand \*before\* you started.  
>  
> CG  
>  
>  
>  
> On Sep 23, 2010, at 7:09, Ducat.Howard@epamail.epa.gov wrote:  
>  
>> Rather than engage in trying to make you understand how things work, and  
>> what my volume of work is, I took the time after your email yesterday, and followed the original suggestions my contractors sent you, which was  
>> contacting the Region 6 contacts that we sent you.  
>>  
>> As I had stated, the ROD for this site was from the older system, and had the figures and graphics removed. In addition, the RODs from the early 1990's do not conform to the current format and standard, because  
>> the standard was not set until the late 1990's (I believe it was sometime in 1998, but I could be off by a year either way).  
>>  
>> The folks in Region 6 were happy to point me at the original ROD, which  
>> I attach here for your information.  
>>  
>> The rest of your comments I will let be, except for the application and  
>> its updating.  
>>  
>> We are in the final stages of testing the application that has been rewritten to pull the original PDF files from storage. We expect that to  
>> be available for public use sometime after January 1st, 2012. It is not  
>> only the RODs we are concerned with, its the Administrative Record(s) for a site as a whole, along with the RODs and FYRs (Five Year Reviews).  
>> The contractor has already been selected, and we've been working on this  
>> for some time. Thank you, though, for showing us that we are doing something that the public actually is anxious to use.  
>>  
>> So here I attach both the ROD that was in the RODS database online (named onlinerod.pdf) and the ROD I received by contacting Region 6 as  
>> suggested by my contractors (OriginalROD.pdf).  
>>  
>> As for my superiors, they are both CC'd on my original response to you,  
>> and have received your response to me as well as this response back to you. Patricia Gowland, and her Assistant, Charles Sands. Please feel free to contact them, or myself, with any further questions you might have.  
>>  
>> I hope you find this information satisfactory  
>>  
>> .(See attached file: OriginalROD.pdf)(See attached file:

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> onlinerod.pdf)
>>
>> Howard C. Ducat
>> OSRTI Webmaster
>> SEMS Communication Services Manager
>> SEMS Reference Desk TO 75 TOPO
>> Superfund Internet/Intranet TO 73 TOPO
>> EPA/OSWER/OSRTI/IMB
>>
>> 703 603-8797 - Office
>>
>> 703-628-8919 TTY/Cell
>>
>> Please consider the environment before printing this e-mail.
>>
>>
>>
>> From:          Grish <curt@grish.org>
>>
>>
>> To:            Howard Ducat/DC/USEPA/US@EPA
>>
>>
>> Cc:            Rishi Das/DC/USEPA/US@EPA, Charles
>> Faultry/R6/USEPA/US@EPA, Nelson Fox/DC/USEPA/US@EPA, Shawn
>>
>>                Ghose/R6/USEPA/US@EPA, "Abby [USA] Lee"
>> <lee_abby@bah.com>, Donald Williams/R6/USEPA/US@EPA,
>> "woodson_joel@bah.com" <woodson_joel@bah.com>, Patricia
>> Gowland/DC/USEPA/US@EPA, Charles Sands/DC/USEPA/US@EPA
>>
>> Date:          09/22/2010 04:37 PM
>>
>>
>> Subject:       Re: Information Request Line Response
>>
>>
>>
>>
>>
>>
>> Mr. Ducat:
>>
>> Thank you for that reply, although I find it unsatisfactory.
>>
>> I assume there is more than one employee at EPA to address questions
>> from the public, is there not?
>>
>> I know as a taxpayer it seems there are very many federal government
>> employees on the public payrolls to deal with this sort of duty. More
>> than are needed, in my humble opinion.
>>
>> It is disconcerting and disheartening to me that with all those
>> federal
>> employees drawing expensive salaries and benefits, we taxpayers still
>> have to pay additionally for consulting contractors to perform what
>> seems to be an essential responsibility of our federal workers. It is
>> particularly galling to me given our current state of national
>> indebtedness.
>>
>> Furthermore, if you personally "screen and see every communication
>> that
>> goes out" from your contractor, as you claim, the volume must not be
>> so
>> onerous as all that.
>>
>> It also seems a wasteful duplication of effort. In the same amount of
>> time it takes you to read and approve (or correct edit, and rewrite)
>> every reply the taxpayers have paid a contractor to create, perhaps
>> you
>> plus one other underutilized federal employee already on the public
>> payroll could actually write the responses yourselves, and we could
>> get
>> rid of expensive consultants for such basic tasks.
>>
>> I stand by my original reaction: the response created by the Booz
>> Allen
>> employee and approved by you was so vague and broad as to cause many
>> more steps to be taken by the EPA in order to answer a simple request.
>> Rather than deal effectively with the issue at hand, additional new
>> issues have been created that will cost other EPA staff time to
>> address.
>>
>> Your statement that "the RODS database maintained on the superfund
>> website is a relic" is offensive and makes no sense. It is certainly
>> no
>> excuse for posting incomplete, potentially misleading information of
>> significant public interest on a government website.
>>
>> A PDF file is the same no matter how the citizen is attempting to
>> access
>> it. How long would you say it has been since a significant proportion
>> of
>> the population has been on dial-up modem? Ten years? Fifteen? When
>> will
>> your department be finished with what you describe as "evaluating our
>> options" and actually accomplish the basic technological tasks you
>> describe? What options do you have, other than to make the public
>> information available in compliance with all pertinent regulations?
>>

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>> Perhaps you should hire Booz Allen for that site upgrade; it might be  
>> exorbitantly expensive, but at least maybe they could get it done in  
>> less than a decade.  
>>  
>> Finally, I reject and refute your assertion that I will have to file  
> an  
>> FOIA request in order to obtain the ROD for Arkwood, particularly when  
>> it is already partially available on the Internet for public  
> inspection  
>> at any time. I believe it is a requirement that that information be  
>> readily and completely available to the public via the inexpensive  
>> medium of the Internet. I will investigate further to see if I am  
>> correct.  
>>  
>> I would like to know to whom you report, so that I may forward these  
>> concerns to her or him. Please send me that person's name and contact  
>> info.  
>>  
>> That should be no problem for you, since you approved your  
> contractor's  
>> sending out the contact info for Charles Faultry, Associate Director,  
>> Superfund Remedial Branch, EPA Region 6 (copied on this communication)  
>> and nine other high-level EPA employees, directing me to call any or  
> all  
>> of them, in response to my low-complexity request which seems to fall  
>> directly in your area of responsibility.  
>>  
>> To me your response is classic governmental doublespeak and  
> bureaucratic  
>> runaround. I believe that is what our President calls "kicking the can  
>> down the road." In my opinion, it is bad business, poor government,  
>> costly to the taxpayers and wasteful of your colleagues' and my time.  
>>  
>> I will obtain the document by other means and suggest you remove from  
>> the EPA website the information request form, since it also seems to  
> be  
>> a "relic" of an anachronistic information system and department.  
>>  
>> The submission form and process behind it do not seem to be effective  
> in  
>> producing result for the taxpaying public but do seem highly effective  
>> in producing jobs for Booz Allen consultants.  
>>  
>> Curt Grisham  
>>  
>> On Sep 22, 2010, at 9:58, Ducat.Howard@.gov wrote:  
>>  
>>> Mr. Grisham -  
>>>  
>>> The information that we sent you were the local Regional contacts for  
>>> the site you asked about, Arkwood Superfund Site ARD084930148.  
>>>  
>>> As to who to start with there, I would say the Site Team Leader would  
>> be  
>>> a good place to start.  
>>>  
>>> The RODS database maintained on the superfund website is a relic of  
>> the  
>>> days when people accessed the internet via dialup modem. The graphics  
>>> have been pulled out of the RODS in order to shrink the size of them,  
>> as  
>>> well as enter them into a searchable database. We are currently  
>>> evaluating our options, and are working on displaying the full Record  
>> Of  
>>> Decision in its original PDF record document indexed and made  
>>> text-searchable.  
>>>  
>>> If you wish to receive a full copy of the original document, you may  
>>> talk with the Region to see if they can provide it to you. You will  
>>> have to submit a Freedom of Information Act request, and you can do  
> so  
>>> Online by visiting <http://www.epa.gov/foia/>.  
>>>  
>>> While each Region designates titles and functions for their  
> employees,  
>>> since processes are different in different areas, I can see how some  
>> of  
>>> the titles can be confusing for you. The Site Team Leader again,  
>> would  
>>> be the best place to start your query of this type as well.  
>>>  
>>> As for why Ms. Lee, from Booz Allen Hamilton sent the correspondence  
>> to  
>>> you, it was at my request. Government Agencies use contractors every  
>> day  
>>> to help manage communications and projects. We get hundreds of  
>> requests  
>>> a day for data, and one employee could not possibly answer all the  
>>> inquiries promptly. I do screen and see every communication that goes  
>>> out.  
>>>  
>>> If you need further assistance, please feel free to contact me  
>> directly.  
>>>  
>>> Thank you for your interest in the EPA.  
>>>  
>>> Sincerely,  
>>>  
>>> Howard C. Ducat  
>>> OSRTI Webmaster  
>>> SEMS Communication Services Manager

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>>> SEMS Reference Desk TO 75 TOPO
>>> Superfund Internet/Intranet TO 73 TOPO
>>> EPA/OSWER/OSRTI/IMB
>>>
>>> 703 603-8797 - Office
>>>
>>> 703-628-8919 TTY/Cell
>>>
>>> Please consider the environment before printing this e-mail.
>>>
>>>
>>> From: "grish.org" <curt@grish.org>
>>>
>>>
>>> To: Ducat.Howard@epamail.epa.gov
>>>
>>>
>>> Cc: Fox.Nelson@epamail.epa.gov, Das.Rishi@epamail.epa.gov,
>> woodson_joel@bah.com, Donald Williams
>>> <Williams.Donald@epamail.epa.gov>, Shawn Ghose
>>> <Ghose.Shawn@epamail.epa.gov>, faultry.charles@epa.gov, "Abby
>>> [USA] Lee" <lee_abby@bah.com>
>>>
>>>
>>> Date: 09/21/2010 07:27 PM
>>>
>>> Subject: Fwd: Information Request Line Response
>>>
>>>
>>>
>>>
>>> Dear Mr. Ducat,
>>>
>>> Thank you for the information. From your message below, however, it
>> is
>>> unclear to me what my next step should be in order to obtain the
>>> complete Record Of Decision for the Arkwood Superfund Site (EPA ID
>>> ARD084930148).
>>>
>>> Although it is a very useful list, I do not know which of the ten
>> people
>>> on your list I should contact in order to receive one complete copy
>> of
>>> the Record Of Decision for this site. Could you be more specific
>> please?
>>> I do not wish to cause duplication of effort on the part of EPA
>> staff.
>>>
>>> Should I contact Branch Chief for AR & TX Charles Faultry for this
>>> information, whom you list at 214-665-2731 faultry.charles@epa.gov?
>>>
>>> Since other people besides myself might need to access it, I suggest
>>> that the person responsible for making the complete information
>>> available to the public on the EPA website ensure that the complete
>>> document is actually posted at:
>>>
>>> http://www.epa.gov/superfund/sites/rods/fulltext/r0690064.pdf
>>>
>>> which is accessed by clicking the "Full-text" link on the "Superfund
>>> Information Systems" website "Record of Decision System (RODS)" page
>> for
>>> the Arkwood site found at:
>>>
>>>
>> http://cfpub.epa.gov/superrods/index.cfm?fuseaction=data.siterods&siteid=0600124
>>
>>>
>>> The document currently found at that location does not appear to be
>>> complete. It has no page numbers, no table of contents, and the page
>>> after the first (title) page is clearly not the beginning of even a
>>> section, since the first section header to appear on this page is
>> "B."
>>> with no part "A." before it. It is therefore largely incomprehensible
>> to
>>> me.
>>>
>>> Could you please explain to me the following terms, used in your
>> list:
>>>
>>> "Site Team Leader"
>>> "CERCLIS Coordinator"
>>> "Removals"
>>> "SAM"
>>> "Regional Brownfields Coordinator"
>>>
>>> I notice your email was sent by Abby Lee from the bah.com domain,
>> which
>>> domain is owned by Booz Allen Hamilton of McLean, Virginia according
>> to
>>> public information. Could you please explain to me what role Booz
>> Allen
>>> has in this matter and why it was the recipient of and responder to
>> my
>>> enquiry, which I submitted on the EPA website? I was not expecting to

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>> be  
>>> forwarded to and answered by a third party.  
>>>  
>>> Thank you.  
>>>  
>>> Curt Grisham  
>>>  
>>> Begin forwarded message:  
>>>  
>>> From: "Lee, Abby [USA]" <lee\_abby@bah.com>  
>>> Date: September 21, 2010 12:14:12 PM PDT  
>>> To: "curt@grish.org" <curt@grish.org>, "  
>>> Ducat.Howard@epamail.epa.gov" <Ducat.Howard@epamail.epa.gov>  
>>> Cc: "Fox.Nelson@epamail.epa.gov" <Fox.Nelson@epamail.epa.gov>, "  
>>> Das.Rishi@epamail.epa.gov" <Das.Rishi@epamail.epa.gov>, "Woodson,  
>>> Joel [USA]" <woodson\_joel@bah.com>  
>>> Subject: Information Request Line Response  
>>>  
>>>  
>>> To expedite your request for Superfund information, this message  
>>> is being transmitted from a non-EPA location. Please address all  
>>> comments and replies to Ducat.Howard@epamail.epa.gov.  
>>>  
>>>  
>>>  
>>>  
>>> Dear Mr. Grisham,  
>>>  
>>>  
>>>  
>>>  
>>>  
>>> In response to your request on September 16, 2010, for information  
>>> on the documentation that appears to be incomplete for the Arkwood  
>>> Site, please contact the EPA Region 06 contacts, listed in the  
>>> attached spreadsheet.  
>>>  
>>>  
>>>  
>>>  
>>> For information on EPA Superfund cleanup sites in your surrounding  
>>> community, please check the following website, Cleanups in My  
>>> Community at, <http://iaspub.epa.gov/Cleanups/index.jsp>. This site  
>>> is used as a mapping and listing tool that shows sites where  
>>> pollution is being or has been cleaned up throughout the United  
>>> States. It maps, lists and provides cleanup progress profiles for  
>>> sites that have been cleaned up under EPA's Superfund, RCRA and/or  
>>> Brownfields cleanup programs.  
>>>  
>>>  
>>>  
>>>  
>>> To submit a request for a customized CERCLIS report or any  
>>> additional information on a CERCLIS site, please check the  
>>> following website:  
>>> <http://www.epa.gov/superfund/sites/phonefax/rods.htm>. Complete  
>>> the order form by including as much information as possible.  
>>> Write any additional comments or specific criteria for the report,  
>>> in the box provided at the end of the order form. Click "Submit"  
>>> when you have completed the form.  
>>>  
>>>  
>>>  
>>>  
>>> We hope that you find this information useful. If you have any  
>>> questions, please contact Howard Ducat at  
>>> Ducat.Howard@epamail.epa.gov.  
>>>  
>>>  
>>>  
>>>  
>>> Sincerely,  
>>>  
>>>  
>>>  
>>>  
>>>  
>>>  
>>> Howard Ducat  
>>>  
>>> Information Management Branch  
>>>  
>>> Office of Superfund Remediation and Technology Innovation  
>>>  
>>>  
>>> US EPA  
>>>  
>>> [attachment "4168.xls" deleted by Howard Ducat/DC/USEPA/US]  
>>>  
>>>

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>>
>>
>>
>> <OriginalROD.pdf>
>> <onlinerod.pdf>
>
>
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>
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